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the trustee of the Sonja Dinihanian GST Trust DTS 1/1/11

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UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

15 In re: ) Case Nos.  
16 15005 NW Cornell LLC and ) 19-31883-dwh11 (Lead case)  
17 Vahan M. Dinihanian, Jr. ) 19-31886-dwh11  
18 Debtor(s). )  
19 ) Jointly Administered Under  
20 ) 19-31883-dwh11  
21 ) TASHA TEHERANI-AMI'S MOTION, IN  
 ) HER CAPACITY AS THE TRUSTEE OF  
 ) THE SONJA DINIHANIAN GST TRUST  
 ) DTS 1/1/11, FOR EXTENSION OF TIME  
 ) TO SUBMIT BALLOT  
 )  
 )

## **LBR 7007-1(a)(1) Certification**

24 Counsel for Tasha Teherani-Ami (“Ms. Teherani-Ami”), in her capacity as the trustee of  
25 the Sonja Dinihanian GST Trust DTS 1/1/11 (the “Trust”) certifies that the parties made a good  
26 forth effort through counsel to confer in an attempt to resolve the matters in this motion, however,

PAGE 1 - TASHA TEHERANI-AMI'S MOTION, IN HER CAPACITY AS THE TRUSTEE OF THE SONJA DINIHANIAN GST TRUST DTS 1/1/11, FOR EXTENSION OF TIME TO SUBMIT BALLOT

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1 after an exchange of emails, they have been unable to do so.

## Motions

3 The Trust, by and through her attorneys, moves the Court under FRBP 9006(b)(2) for an  
4 order extending the deadline to September 3, 2021, so the ballots the Trust submitted on that date  
5 may be counted regarding the Debtors' proposed Second Amended Joint Plan of Reorganization  
6 Dated July 22, 2021 (Dkt #402)(“July Plan”).

## Procedural Background

8 The debtors filed their July Plan on July 23, 2021. The Court approved the associated  
9 disclosure statement on July 26, 2021. Debtors served the order including the ballot form on July  
10 30, 2021. The deadline for submission of a ballot was August 31, 2021. The Trust filed its ballots  
11 on September 3, 2021.

## Conclusion

13 The Trust requests an order extending the deadline to submit ballots to September 3, 2021,  
14 so that the Trust's ballots which have been submitted can be accepted and counted.

Dated September 7, 2021.

WYSE KADISH LLP

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Of Attorneys for Tasha Teherani-Ami, in her  
capacity as the trustee of the Sonja Dinihanian  
GST Trust DTS 1/1/11

## **CERTIFICATE OF SERVICE**

I certify that on the date below, I caused the above pleading to be served on counsel for the  
in this proceeding and other interested parties requesting notice through the Court's  
CF system, and, on those not a part of CM/ECF, by first class U.S. mail, including:

NONE

DATED: September 7, 2021.

/s/ Bruce H. Orr  
Bruce H. Orr, OSB No. 813297

Dated: September 7, 2021.

WYSE KADISH LLP

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## **CERTIFICATE OF SERVICE**

2 On September 7, 2021, I served copies of the above TASHA TEHERANI-AMI'S  
MOTION, IN HER CAPACITY AS THE TRUSTEE OF THE SONJA DINIHANIAN GST  
3 TRUST DTS 1/1/11, FOR EXTENSION OF TIME TO SUBMIT BALLOT on the following  
entitled to notice:

1) through CM/ECF:

Douglas R. Pahl  
Attorney for debtor 15005 NW Cornell LLC

Nicholas J. Henderson  
Troy Sexton  
Attorneys for debtor Vahan M. Dinihanian

Stephen P. Arnot  
U.S. Trustee

Eleanor A. Dubay  
Attorney for creditor Tasha Teherani-Ami

Elayna Z. Matthews  
Attorney for Columbia State Bank

Daniel L. Steinberg  
Attorney for Cornell Road LLC; Lillian  
Logan

Erich M. Paetsch  
Attorney for Columbia State Bank

Russell D. Garrett  
Attorney for Alexander LLC, et al.

2) using paper by first class mail on those who do not participate in this case through CM/ECF:

DATED: September 7, 2021

/s/ Bruce H. Orr  
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